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October 28, 2015

VIA EMAIL

The Honorable Shira A. Scheindlin
U.S. District Court for the Southern District of New York
500 Pearl Street - Room 1620
New York, New York 10007

Re: Rubenstein v. HC2 Holdings, Inc. and
Novatel Wireless Inc., 15 Civ. 6939 (SAS) (JCF)

File No. 056959

Dear Judge Scheindlin:

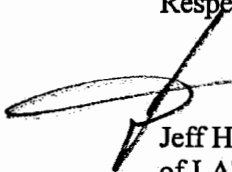
We represent defendant HC2 Holdings, Inc. in this matter. We write, with the consent of all other parties, to ask the Court for an adjournment of the answer date and initial conference date in this matter, presently scheduled for November 2 and November 4, 2015, respectively. The parties have made substantial progress toward a settlement, which should resolve the case in its entirety, but need additional time to finalize the settlement documentation.

The parties request that the date to move, answer or otherwise respond to the Complaint, presently November 2, 2015, be extended for thirty days until Wednesday, December 2, 2015. The parties anticipate that, prior to this date, they will have completed documentation of the settlement. No prior requests for an extension of this date have been made in this action.

With respect to the November 4 initial conference, in light of the pendency of settlement, there does not appear to be a need for a formal initial conference. The parties therefore request an adjournment of that November 4 conference. Please note that the parties are available on November 4 if the Court wishes to convene a conference at that time.

Thank you for your attention in this matter.

Respectfully,

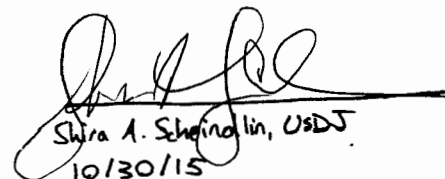


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Defendants' request is GRANTED. The date to move, answer, or otherwise respond to the Complaint shall be December 2, 2015. The initial conference in this case, scheduled for November 4, 2015, is adjourned to December 8, 2015, at 4:00 PM.

SO ORDERED:

cc: Miriam Tauber, Esq. (MiriamTauberLaw@gmail.com)
James B. Worthington, Esq. (jamesworthington@paulhastings.com)
Peter Marshal Stone, Esq. (peterstone@paulhastings.com)


Shira A. Scheindlin, USDS
10/30/15